

S1.F: “Stormwater discharges to ground will be regulated as part of permit coverage for all facilities under this permit.” This needs considerable clarification. Where is the “point of discharge” for an infiltration facility? Groundwater and surface water standards aren’t the same, which will apply? Will sampling be required, and if so, where will the sample be taken? How is this being coordinated with the revisions to the State UIC?

S2.B.3.c.ii: Last sentence. How do agencies receive approval of the SWPPP contents? At the workshop it was stated that approval would only be obtained if a site visit is required. This is too late in the process to find out that a SWPPP is inadequate. It is unreasonable to ask an agency to invest in the preparation of the SWPPP and expend manpower and funds for training without an approval mechanism.

S2.B.4.c: Same as above.

S2.C.2.a: Same as above

S3.D.1: “---must comply with the State’s water quality standards for the named pollutant(s) at the point of discharge.” Should read “---must comply with the State’s water quality standards for the named pollutant(s) at the limits of the mixing zone.”

S4: This section requires guidance for monitoring and sampling at infiltration facilities.

S9: This section requires an approval process for the SWPPP. Also, delete the reference to use of the Western Washington Manual in Eastern Washington. I would suggest something along the lines of, “Facilities in eastern Washington shall use BMP’s appropriate to the hydrogeology of their region.”

It was stated during the workshop that there would not be additional permit fees for this permit, for municipalities that already have an NPDES permit for their waste water treatment plants. Please confirm.